

**REMARKS/ARGUMENTS**

The Office Action mailed April 6, 2007 has been carefully considered. Reconsideration in view of the following remarks is respectfully requested.

Claims 93, 106, 114 and 127 have been amended to further particularly point out and distinctly claim subject matter regarded as the invention. Support for these changes may be found in the specification, drawings, and claims as originally filed. Applicants respectfully submit therefore that the amendments do not add new matter.

With this amendment it is respectfully submitted the claims satisfy the statutory requirements.

**The 35 U.S.C. § 112, Second Paragraph Rejection**

Claims 106-108 and 127-129 were rejected under 35 U.S.C. § 112, second paragraph, as allegedly being indefinite for failing to particularly point out and distinctly claim the subject matter applicant regards as the invention.

In response applicants have amended the claims to provide proper antecedent basis.

**The 35 U.S.C. § 102 and § 103 Rejections**

Claims 93-102, 104, 106-123, 125 and 127-134 were rejected under 35 U.S.C. § 102(e) as being allegedly anticipated by Koskas<sup>1</sup>. Applicants respectfully submit that claim 93, as amended, is not anticipated nor rendered obvious by Koskas. Claim 93 includes the following limitations.

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<sup>1</sup> U.S. Patent No. 6,564,212

A method for sending a multidimensional database query to one or more data servers, the multidimensional database query including a grid having one or more rows and one or more columns, an action range, and an operation, the method comprising:

creating a row tree structure, said row tree structure representing title and header rows in the query grid;

creating a column tree structure, said column tree structure representing header columns in the query grid;

performing the operation on the row tree structure and the column tree structure;

splitting the query grid into two or more split query grids using the row tree structure and the column tree structure, wherein each split query grid represents a portion of the database query;

transmitting the split query grids to the one or more data servers;

parsing the two or more split query grids to identify n header rows;

discarding the first n rows of each parsed split query grid subsequent to a first parsed split query grid to obtain one or more resultant split query grids, where n is the number of rows traversed until a first data item is encountered; and

appending each resultant split query grid to the first parsed split query grid.

(Amended claim 93) (Emphasis added)

Applicants have amended the claims to more distinctly claim the invention. Applicants respectfully submit that Koskas does not include the limitation on parsing the split query grids and discarding n row of each, other than the first, where n is the number of rows traversed until a first data item is encountered and subsequently appending the resultant split query grids to the first split query grid.

Moreover, applicants maintain that Applicants respectfully submit that Koskas does not disclose or suggest the limitation of splitting the query grid into two or more split query grids using the row tree structure and the column tree structure. As cited by the Examiner in this regard Koskas discloses the following.

“A possible architecture of the parallel query processing engine is illustrated in FIG. 72, in the particular case where all blocks have the same size jmax. A number M of matching units 700 are connected to a query server 701 through a communication network 702. Each matching unit 700 may be a processor system of the type shown in FIG. 18. It has a storage device 703 such as a hard drive for storing the thesaurus sections associated with the block. If a link table of the type shown in FIG. 9 is used, it is partitioned into blocks in the same manner as the virtual flat file, and each block is stored in the corresponding matching unit. The server 701 provides the man-machine interface. It translates the query criteria of the SQL WHERE clause into trees of the type shown in FIG. 37, which are provided to the M matching units 700 along with a description of

the desired output. Each of the units 700 does its part of the job according to steps 191-193 of FIG. 36 and returns its response to the server 701. The latter compiles the results from the different matching units to provide the overall response to the user. In order to perform the analysis of step 191, each matching unit 700 uses its thesaurus sections.

Alternatively, the analysis of the query criteria could be executed centrally by the server 701 by means of global thesauruses, each global thesaurus being common to all the (macro)words and having M columns for containing pointers to identifier sub-lists in the M storage units 703. At the end of the analysis stage, the relevant pointers are addressed to the matching units 700 for their execution of steps 192-193.

An update server 704, which may be the same machine as the query server 701, is also connected to the network 702 to create and maintain the VDG's relating to the different blocks. It monitors the changes made in the data tables of the RDBMS and routes thesaurus update commands to the units 700 in order to make the necessary changes in the thesaurus sections."

(Koskas, col. 51, lines 30 – 50) (Emphasis added)

A thorough reading of this section of Koskas, and Koskas as a whole, makes clear that what is described is the partitioning of a link table into blocks and storing them in corresponding processor systems (matching units). Koskas is therefore partitioning the trees and not the query grid. Moreover, the partitioning described in Koskas is not equivalent to the "splitting of the query grid" as claimed.

For these reasons, applicants respectfully submit that claim 93, is not anticipated or rendered obvious by Koskas. Given that claim 114 includes similar limitations and that all pending claims depend, directly or indirectly, from one of claims 93 and 114, applicants respectfully submit that all pending claims are, likewise, not anticipated or rendered obvious by Koskas.

For these reasons applicants further maintain that none of the pending claims are rendered obvious by Koskas.

In view of the foregoing, it is respectfully asserted that the claims are now in condition for allowance.

Request for Entry of Amendment

Entry of this Amendment will place the Application in better condition for allowance, or at the least, narrow any issues for an appeal. Accordingly, entry of this Amendment is appropriate and is respectfully requested.

Conclusion

It is believed that this Amendment places the above-identified patent application into condition for allowance. Early favorable consideration of this Amendment is earnestly solicited.


If, in the opinion of the Examiner, an interview would expedite the prosecution of this application, the Examiner is invited to call the undersigned attorney at the number indicated below.

Applicant respectfully requests that a timely Notice of Allowance be issued in this case. Please charge any additional required fee or credit any overpayment not otherwise paid or credited to our deposit account No. 50-1698.

Respectfully submitted,

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